



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

September 23, 2020

By ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Tymel Abrams*, 20 CR 352 (JMF)

Dear Judge Furman,

The Government writes on behalf of the parties and in response to the Order of the Court dated September 21, 2020. The parties respectfully request an adjournment of approximately 30 days of the conference scheduled for October 7, 2020 to a date and time that is convenient for the Court. The parties continue to discuss a possible pre-trial disposition of this case and anticipate that it will be possible to advise the Court whether such a disposition is possible by the date of any adjournment. For this reason, the parties respectfully request that the Court further defer setting a schedule for any pre-trial motions and a trial until the date of any adjournment. Finally, with the consent of the defendant, the Government respectfully requests that the Court exclude time under the Speedy Trial Act from today through the date of any adjournment pursuant to 18 U.S.C. § 3161(h)(7) on the basis that the interests of the defendant and the public in a speedy trial are outweighed here by the ends of justice served by allowing the defendant to consider further the possibility of a pre-trial disposition and to meet with his counsel regarding that decision. The Government respectfully submits that such an exclusion is further appropriate under the

circumstances of the ongoing national emergency declared in response to the coronavirus pandemic.

Respectfully submitted,


AUDREY STRAUSS
Acting United States Attorney

By: Thomas John Wright
Thomas John Wright
Assistant United States Attorney
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Enclosure: Proposed Order

cc: Christopher Flood, Esq. (Counsel to Defendant Tymel Abrams) (by ECF)

Application GRANTED. The conference is hereby ADJOURNED to November 16, 2020, at 2:30 p.m. The Court excludes time under the Speedy Trial Act between today and November 16, 2020, finding that the interests in excluding that time outweigh the interests of the Defendant and the public in a speedy trial given the need for the Defendant to confer with counsel with respect to whether and how to change his plea in view of the COVID-19 situation and the difficulty of safely convening in person at this time. The Clerk of Court is directed to terminate Doc. #14. SO ORDERED.



September 24, 2020